

# **EXHIBIT 3**

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## Robert Hunter Biden v. Fox News Network, et al., 24-cv-07814

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**Tina Glandian** <tina@geragos.com>

Thu, Oct 17, 2024 at 12:00 PM

To: "Engel, Steven A." <Steven.Engel@dechert.com>

Cc: "McGinley, Michael" <Michael.McGinley@dechert.com>

Hi Steven,

Attached please find the Affidavits of Service on the Fox defendants and Jason Klarman, as well as the Affidavit of Attempts on Mr. Dinh. Given that Fox News Network, LLC was served at 9:56 a.m., your Notice of Removal is defective and contains an incorrect representation that "[a]t the time of that filing, neither Fox News nor Fox Corporation had been served with the Complaint." Fox Defendants' Notice of Removal, ¶ 3. Now that you are in receipt of the Affidavits of Service proving otherwise, please advise if you will be withdrawing your Notice of Removal. In the event that you do not do so, we intend to file Objections to the Notice of Removal and a Motion for Remand in which we will seek our attorneys' fees and costs incurred in connection with the removal and such motion pursuant to 28 U.S.C. § 1447(c).

Thank you,  
Tina

**TINA GLANDIAN**  
ATTORNEY AT LAW

\*ADMITTED IN NY, CA, NV & FL



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NEW YORK, NEW YORK 10001  
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This e-mail, including attachments, contains information that is confidential and may be protected by the attorney/client and other privileges. If you are not an intended recipient, please delete this e-mail, including any attachments, and notify me by return mail or e-mail.

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**FOX Affidavits of Service.pdf**  
204K

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

**Plaintiff / Petitioner:**

ROBERT HUNTER BIDEN

**Defendant / Respondent:**

FOX NEWS NETWORK, LLC, FOX CORPORATION, VIET D. DIHH,  
JASON KLARMAN and "JOHN and JANE DOES" 1-100

**AFFIDAVIT OF SERVICE**

Index No: 159463/2024

For:  
Geragos & Geragos, APC

The undersigned being duly sworn, deposes and says; deponent is not a party herein, is over 18 years of age and that on OCTOBER 15, 2024 AT 9:56 AM at 99 Washington Avenue, Albany Ny 12210 deponent served the within NOTICE OF ELECTRONIC FILING, SUMMONS and VERIFIED COMPLAINT - Jury Trial Demanded upon FOX NEWS NETWORK, LLC, via NEW YORK SECRETARY OF STATE (NYDOS)

- ☐ **Individual:** by delivering a true copy of each to said defendant, personally; deponent knew the person so served to be the person described as said defendant therein.
- ☒ **Corporation:** by delivering a true copy of each to SOUE ZOUKY as NYDOS Intake agent personally, deponent knew said corporation so served to be the corporation described, and knew said individual to be authorized to accept service.
- ☐ **Suitable Person:** by delivering thereat, a true copy of each to \_\_\_\_\_ as a person of suitable age and discretion.
- ☐ **Affixing to Door:** by affixing a true copy of each to the door thereof, deponent was unable with due diligence to find defendant, or a person of suitable age or discretion thereat, having called thereon; at
- ☐ **Mailing:** By first class mail to the person to be served at his or her abode in an envelope bearing the legend "personal and confidential" and not indicating on the outside thereof, by return address or otherwise, that the communication is from an attorney or concerns an action against the person to be served. Mailed on
- ☐ **Military Service:** I asked the person spoken to whether defendant was in active military service of the United States or of the State of New York in any capacity whatever and received a negative reply.

**Description**

**Sex:** ☐ Male ☒ Female

**Height:** ☐ Under 5' ☒ 5'0"-5'3" ☐ 5'4"-5'8" ☐ 5'9"-6'0" ☐ Over 6'

**Weight:** ☐ Under 100Lbs. ☒ 100-130 Lbs ☐ 131-160 Lbs ☐ 161-200Lbs ☐ Over 200 Lbs

**Age:** ☐ 14-20 Yrs ☐ 21-35 ☐ 36-50 Yrs ☒ 51-65 Yrs ☐ Over 65

**Hair Color:** ☒ Black ☐ Brown ☐ Blond ☐ Grey ☐ Red ☐ White ☐ Balding ☐ Bald

**Ethnicity:** Caucasian

"I affirm this 17 day of October 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law"

  
ANDREW CERVELLI

Contracted for;

LLS

41 Schermerhorn Street

Brooklyn, NY 11201

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

**Plaintiff / Petitioner:**

ROBERT HUNTER BIDEN

**Defendant / Respondent:**

FOX NEWS NETWORK, LLC, FOX CORPORATION, VIET D. DIHH,  
JASON KLARMAN and "JOHN and JANE DOES" 1-100

**AFFIDAVIT OF SERVICE**

Index No: 159463/2024

For:

Geragos & Geragos, APC

The undersigned being duly sworn, deposes and says; deponent is not a party herein, is over 18 years of age and that on OCTOBER 15, 2024 AT 11:44 AM at 1211 Avenue of The Americas, New York, NY 10036, deponent served the within NOTICE OF ELECTRONIC FILING, SUMMONS and VERIFIED COMPLAINT - Jury Trial Demanded upon JASON KLARMAN

- ☐ **Individual:** by delivering a true copy of each to said defendant, personally; deponent knew the person so served to be the person described as said defendant therein.
- ☐ **Corporation:** by delivering a true copy of each to \_\_\_\_\_ personally, deponent knew said corporation so served to be the corporation described, and knew said individual to be authorized to accept service.
- ☒ **Suitable Person:** by delivering thereat, a true copy of each to "JOHN DOE" as Messenger Center Intake agent who refused to disclose name as a person of suitable age and discretion.
- ☐ **Affixing to Door:** by affixing a true copy of each to the door thereof, deponent was unable with due diligence to find defendant, or a person of suitable age or discretion thereat, having called thereon; at
- ☒ **Mailing:** By first class mail to the person to be served at his or her abode in an envelope bearing the legend "personal and confidential" and not indicating on the outside thereof, by return address or otherwise, that the communication is from an attorney or concerns an action against the person to be served. Mailed on OCTOBER 16, 2024
- ☒ **Military Service:** I asked the person spoken to whether defendant was in active military service of the United States or of the State of New York in any capacity whatever and received NO reply.

**Description**

Sex: ☒ Male ☐ Female

Height: ☐ Under 5' ☐ 5'0"-5'3" ☐ 5'4"-5'8" ☒ 5'9"-6'0" ☐ Over 6'

Weight: ☐ Under 100Lbs. ☐ 100-130 Lbs ☐ 131-160 Lbs ☐ 161-200Lbs ☒ Over 200 Lbs

Age: ☐ 14-20 Yrs ☐ 21-35 ☒ 36-50 Yrs ☐ 51-65 Yrs ☐ Over 65

Hair Color: ☐ Black ☐ Brown ☐ Blond ☐ Grey ☐ Red ☐ White ☐ Balding ☒ Bald

Ethnicity: African - American

"I affirm this 17 day of October 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law"

  
RODRICK GREEN

Contracted for;

LLS

41 Schermerhorn Street  
Brooklyn, NY 11201

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

**Plaintiff / Petitioner:**

ROBERT HUNTER BIDEN

**Defendant / Respondent:**

FOX NEWS NETWORK, LLC, FOX CORPORATION, VIET D. DIHH,  
JASON KLARMAN and "JOHN and JANE DOES" 1-100

**AFFIDAVIT OF SERVICE**

Index No: 159463/2024

For:

Geragos & Geragos, APC

The undersigned being duly sworn, deposes and says; deponent is not a party herein, is over 18 years of age and that on OCTOBER 15, 2024 AT 11:44 AM at 1211 Avenue of The Americas, New York, NY 10036, deponent served the within NOTICE OF ELECTRONIC FILING, SUMMONS and VERIFIED COMPLAINT - Jury Trial Demanded upon FOX NEWS NETWORK, LLC

- ☐ **Individual:** by delivering a true copy of each to said defendant, personally; deponent knew the person so served to be the person described as said defendant therein.
- ☐ **Corporation:** by delivering a true copy of each to \_\_\_\_\_ personally, deponent knew said corporation so served to be the corporation described, and knew said individual to be authorized to accept service.
- ☒ **Suitable Person:** by delivering thereat, a true copy of each to "JOHN DOE" as Messenger Center Intake agent who refused to disclose name as a person of suitable age and discretion.
- ☐ **Affixing to Door:** by affixing a true copy of each to the door thereof, deponent was unable with due diligence to find defendant, or a person of suitable age or discretion thereat, having called thereon; at
- ☒ **Mailing:** By first class mail to the person to be served at his or her abode in an envelope bearing the legend "personal and confidential" and not indicating on the outside thereof, by return address or otherwise, that the communication is from an attorney or concerns an action against the person to be served. Mailed on OCTOBER 15, 2024
- ☐ **Military Service:** I asked the person spoken to whether defendant was in active military service of the United States or of the State of New York in any capacity whatever and received a negative reply.

**Description**

Sex: ☒ Male ☐ Female

Height: ☐ Under 5' ☐ 5'0"-5'3" ☐ 5'4"-5'8" ☒ 5'9"-6'0" ☐ Over 6'

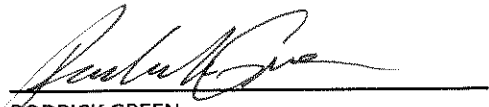
Weight: ☐ Under 100Lbs. ☐ 100-130 Lbs ☐ 131-160 Lbs ☐ 161-200Lbs ☒ Over 200 Lbs

Age: ☐ 14-20 Yrs ☐ 21-35 ☒ 36-50 Yrs ☐ 51-65 Yrs ☐ Over 65

Hair Color: ☐ Black ☐ Brown ☐ Blond ☐ Grey ☐ Red ☐ White ☐ Balding ☒ Bald

Ethnicity: African - American

"I affirm this 17 day of October, 2024 under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law"

  
RODRICK GREEN

Contracted for;

LLS

41 Schermerhorn Street

Brooklyn, NY 11201

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

**Plaintiff / Petitioner:**

ROBERT HUNTER BIDEN

**Defendant / Respondent:**

FOX NEWS NETWORK, LLC, FOX CORPORATION, VIET D. DIHH,  
JASON KLARMAN and "JOHN and JANE DOES" 1-100

**AFFIDAVIT OF SERVICE**

Index No: 159463/2024

For:

Geragos & Geragos, APC

The undersigned being duly sworn, deposes and says; deponent is not a party herein, is over 18 years of age and that on OCTOBER 15, 2024 AT 1:27 PM (pst) at 330 North Brand Boulevard Suite 700, Glendale, CA 91203 deponent served the within NOTICE OF ELECTRONIC FILING, SUMMONS and VERIFIED COMPLAINT - Jury Trial Demanded upon FOX CORPORATION via CT CORPORATION SYSTEM as Registered Agent

- ☐ **Individual:** by delivering a true copy of each to said defendant, personally; deponent knew the person so served to be the person described as said defendant therein.
- ☒ **Corporation:** by delivering a true copy of each to JAQUELINE MEJIA as CT Corporation System Intake Agent personally, deponent knew said corporation so served to be the corporation described, and knew said individual to be authorized to accept service.
- ☐ **Suitable Person:** by delivering thereat, a true copy of each to \_\_\_\_\_ as a person of suitable age and discretion.
- ☐ **Affixing to Door:** by affixing a true copy of each to the door thereof, deponent was unable with due diligence to find defendant, or a person of suitable age or discretion thereat, having called thereon; at
- ☐ **Mailing:** By first class mail to the person to be served at his or her abode in an envelope bearing the legend "personal and confidential" and not indicating on the outside thereof, by return address or otherwise, that the communication is from an attorney or concerns an action against the person to be served. Mailed on
- ☐ **Military Service:** I asked the person spoken to whether defendant was in active military service of the United States or of the State of New York in any capacity whatever and received a negative reply.

**Description**

**Sex:** ☐ Male ☒ Female

**Height:** ☐ Under 5' ☒ 5'0"-5'3" ☐ 5'4"-5'8" ☐ 5'9"-6'0" ☐ Over 6'

**Weight:** ☐ Under 100Lbs. ☐ 100-130 Lbs ☒ 131-160 Lbs ☐ 161-200Lbs ☐ Over 200 Lbs

**Age:** ☐ 14-20 Yrs ☒ 21-35 ☐ 36-50 Yrs ☐ 51-65 Yrs ☐ Over 65

**Hair Color:** ☒ Black ☐ Brown ☐ Blond ☐ Grey ☐ Red ☐ White ☐ Balding ☐ Bald

**Ethnicity:** Hispanic

"I affirm this 17 day of October, 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law"

Dean DeVito  
DEAN DeVITO

Contracted for;

LLS

41 Schermerhorn Street  
Brooklyn, NY 11201

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

**Plaintiff / Petitioner:**

ROBERT HUNTER BIDEN

**Defendant / Respondent:**

FOX NEWS NETWORK, LLC, FOX CORPORATION, VIET D. DIHH,  
JASON KLARMAN and "JOHN and JANE DOES" 1-100

**AFFIDAVIT OF ATTEMPTS**

Index No: 159463/2024

For:

Geragos & Geragos, APC

The undersigned being duly sworn, deposes and says; deponent is not a party herein, is over 18 years of age and that on OCTOBER 16, 2024 AT 8:09 AM (pst) AT 14330 West Sunset Boulevard, Pacific Palisades, CA 90272, deponent served the within NOTICE OF ELECTRONIC FILING, SUMMONS and VERIFIED COMPLAINT upon VIET D. DINH

- ☐ **Individual:** by delivering a true copy of each to said defendant, personally; deponent knew the person so served to be the person described as said defendant therein.
- ☐ **Corporation:** \_\_\_\_\_ a defendant, therein named, by delivering a true copy of each to \_\_\_\_\_ personally, deponent knew said corporation so served to be the corporation described, and knew said individual to be \_\_\_\_\_ thereof.
- ☐ **Suitable Person:** by delivering thereat, a true copy of each to \_\_\_\_\_ as a person of suitable age and discretion.
- ☒ **Attempts:** by affixing a true copy of each to the door thereof, deponent was unable with due diligence to find defendant, or a person of suitable age or discretion thereat, having called thereon at: 10/15/24 @ 7:13 PM (pst) // 10/16/24 @ 8:09 AM (pst)
- ☐ **Mailing:** By first class mail to the person to be served at his or her abode in an envelope bearing the legend "personal and confidential" and not indicating on the outside thereof, by return address or otherwise, that the communication is from an attorney or concerns an action against the person to be served. Mailed on \_\_\_\_\_.
- ☐ **Military Service:** I asked the person spoken to whether defendant was in active military service of the United States or of the State of New York in any capacity whatever and received a negative reply.

**Description**

Sex: ☐ Male ☐ Female

Height: ☐ Under 5' ☐ 5'0"-5'3" ☐ 5'4"-5'8" ☐ 5'9"-6'0" ☐ Over 6'

Weight: ☐ Under 100Lbs. ☐ 100-130 Lbs ☐ 131-160 Lbs ☐ 161-200Lbs ☐ Over 200 Lbs

Age: ☐ 14-20 Yrs ☐ 21-35 ☐ 36-50 Yrs ☐ 51-65 Yrs ☐ Over 65

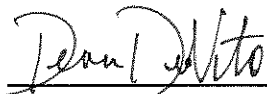
Hair Color: ☐ Black ☐ Brown ☐ Blond ☐ Grey ☐ Red ☐ White ☐ Balding ☐ Bald

Color of Skin - describe color: \_\_\_\_\_

Other identifying features if any: \_\_\_\_\_

Other \_\_\_\_\_

I affirm this 17 day of October, 2024, under the penalties of perjury under the laws of New York, which may include a fine or imprisonment, that the foregoing is true, and I understand that this document may be filed in an action or proceeding in a court of law.



DEAN DeVITO

for;

LLS

41 Schermerhorn Street  
Brooklyn, NY 11201